patent of Shouse et al. while the same claims are rejected as allegedly rendered obvious by the United States patent of Marker et al. in view of that of Scheldorfer.

Addressing first the rejection of the application as anticipated by Shouse et al., Applicant points to material differences that exist between that reference and the invention as claimed that render the capabilities and operation of the two devices significantly different. In Shouse et al., a handle 18 (not a hook) and a clip member 20 (also not a hook) are arranged at opposed ends of an elongated member 12. The different structures of Shouse et al. and the claimed invention are reflected in their different modes of operation. In Shouse et al., the end of the seat belt is held by the spring force of a clip while the plate at the end of the seat belt is more simply held by engagement to a hook 16 in the invention. Furthermore, the transverse relationship between the terminal hooks 14 and 16 of the invention, each properly sized to fit within one of the orthogonal dimensions of the channel 26 through an auxiliary seat permits the user to begin the process of pulling a seat belt through the channel by either (1) inserting the tool 10 through the channel 26 and then grasping the plate at the end of the seat belt or (2) grasping the plate and then pushing the tool 10

through the channel 26. The sizing of the orthogonal hooks, none of which structure is disclosed in Shouse et al., permits such useful variety of operation.

The second rejection is similarly flawed. Marker et al. is cited at teaching a tool for threading the seat belt of an automobile through the channel of a child's auxiliary seat that includes (see Figure 4) a j-shaped hook member 42 at the end of a planar handle 16 while Scheldorfer is directed to a device for grasping a zipper that includes a shank 10 having a hook-shaped handle 11 at its proximate end and a hook 14 affixed adjacent its remote end for grasping the pull tab 8 of a zipper.

Neither of the cited references is designed or intended to be utilized in the environment of the present invention (a transverse channel of defined orthogonal dimensions) and each accordingly lacks any teaching of significant limitations of the claims. Figure 1 of Marker et al. makes it clear that the device of that patent is intended to thread a seat belt through slots in a back member 19 of a child's seat. No mention is made of the limitations imposed by the dimensions of a two-dimensional channel and the design of Marker et al. accordingly does not reflect this structure of the claimed invention.

The structure of Scheldorfer similarly ignores the limitations imposed by the environment of the invention as it is intended to be operated "in the open" and without limitation as to transverse dimensions. The fact that the handle 11 of the device may be either parallel or orthogonal to the hook 14 is irrelevant as it is presented as a matter of mere design choice and therefore provides no insight to solution of the sizing problems encountered in the environment of the invention.

Claim 1 and the claims that depend therefrom are directed to a tool for installation of a seat of the type that includes a transverse channel having a length, height and width for receiving a seat belt. Such tool is defined by, among other limitations, "an integral rod" that includes "a first generally arcuate hook and a second generally arcuate hook" at opposed ends of an "elongated member" with the "first hook lying in a first plane and said second hook lying in a second plane orthogonal to said first plane". The first hook is "of lesser maximum dimension orthogonal to the length of said elongated member than the height of said transverse channel and said second hook being of lesser maximum dimension orthogonal to said elongated member than the width of said transverse channel". Accordingly the tool of the invention is clearly and specifically limited and defined with reference to its environment of intended

operation --the transverse channel of an auxiliary seat-. Such material limitation is neither taught nor suggested by any of the art of record.

For the foregoing reasons, all presently pending claims of this application now clearly define patentable subject matter. Prompt allowance and issuance of all presently-pending claims are therefore earnestly solicited.

Respectfully submitted,

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